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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

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WD OF WI

SAMUEL HAYWOOD MYLES,

PLAINTIFF,

vs.

MEDICAL STAFF DOCTOR

DOCTOR RAVI GUPTA

IN HIS INDIVIDUAL CAPACITY

and HIS OFFICIAL CAPACITY

UNKNOWN NAME MEDICAL

STAFF PHARMACIST IN HER

INDIVIDUAL CAPACITY

and HER OFFICIAL CAPACITY

DEFENDANTS,

et. al.

14 C 661

COMPLAINT UNDER

AND

PURSUANT TO

BIVENS

42 U.S.C. SECTION § 1983

Come now Plaintiff Samuel Haywood Myles, in and Pre-se
Complaint under and Pursuant to... Bivens... 42 U.S.C. Se-
ction § 1983... for Violation of Plaintiff Constitutional Right-
t's under the Eighth and Fourteenth Amendment of the
United States Constitution.

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STATEMENT OF CLAIM

Come now Plaintiff Samuel Heywood Myles, in and Pro-se Complaint under and Pursuant to... Bivens... 42, U.S.C. Section 1983... for Violation of Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution.

Come now Plaintiff Samuel Heywood Myles, filing and Pro-se Complaint regarding and Medical Malpractice Claim for Damages under and Pursuant to... Bivens... 42, U.S.C. Section 1983... before and within the United States District Court For The Western District of Wisconsin.

Plaintiff Complaint (or) Claim is regarding to and Medical Drug Overdose from and... (incorrect dosage)... of and high blood pressure Medication (or) Medicine by Federal Correctional Institution Medical Staff at Federal Correctional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, Claim is against two Institutional Medical Staff, Medical Staff Doctor, Doctor Ravi Gupta, in his Individual Capacity and his Official Capacity

STATEMENT OF CLAIM

et. al., and Unknown Name Medical Staff Pharmacist in her Individual Capacity and her Official Capacity et. al.,

...and Inmate may have and liberty interest arising from a statute, rule, or regulation written in mandatory language...

...due process clause may also be implicated when a prisoner's suffer's personal injury (or) loss of property...

Plaintiff Samuel Haywood Myles, come now before and within The United States District Court For The Western District of Wisconsin, with and Claim against Medical Staff Doctor, Doctor Ravi Gupta and Medical Staff Unknown Name Pharmacist, Claim for their Negligent (or) Wrongful act or omission acting within the scope of his (or) her, Office of employment Medical Staff have and has... (Violated)... or ere in... (Violation) ... of... (1). DUTY: 'an act or course of action that is demanded of one... (2). BREACH: 'to fail to fulfill (e promise)... (3). CAUSATION: 'the act or process of causing... (4). DAMAGES: 'loss (or) harm resulting from injury to person...

A. (2).

STATEMENT OF CLAIM

resulting from injury to person, . . .

Plaintiff claim that Medical Staff (or) Official's must provide [Plaintiff], Inmate's with fair treatment, Medical Staff (or) Prison Official's must comply with their own mandatory regulation.

. . . Plaintiff claim regarding and Medical Malpractice Claim for contribution, Compensatory Damages and Punitive Damages regarding and Medical Drug Overdose from (and) in correct dose of . . . (HIGH BLOOD PRESSURE MEDICATIONS (or) MEDICINES), . . .

. . . (1) . . . (amlodipine) . . . (2) . . . (lisinopril) . . .

Plaintiff Samuel Haywood Myers, who on and routine visit to Medical Per . . . (Hypertension) . . . Institutional Medical Staff Doctor, Doctor Ravi Bunte, would personally prescribed and second Medication (or) Medicine Per . . . (Hypertension) . . . (LISINOPRIL) . . . Institutional Medical Staff Doctor, Doctor Ravi Bunte, didn't request and routine visit (or) any form of regular

A. (3).

STATEMENT OF CLAIM

monitoring of Plaintiff blood pressure before (or) when placing Plaintiff on the Medication (or) Medicine... (LISINOPRIL).

... (Claim against Defendant for injuries sustained as a result of a Medical-Overdose)
... (Claim against Defendant who is liable for the amount of Unreasonably danger cause by and Medical-Overdose)... (Claim against Defendant for being in Violation of Duty, Breach, Causation and Damages in regard to and Medical-Overdose)... (Claim against Defendant for Violation of Plaintiff Constitutional Rights Under the Eighth Amendment of the United States Constitution)... (Claim against Defendant for Violation of Plaintiff Constitutional Rights Under the Fourteenth Amendment of the United States Constitution)... (Claim against Defendant for failure to monitor Plaintiff blood pressure before placing Plaintiff on the Medication (or) Medicine LISINOPRIL)... Claim against Defendant for duty to protect

A.(4).

STATEMENT OF CLAIM

Plaintiff from harm, and to provide Plaintiff with reasonable Medical Care)... (Claim for Compensatory Damages and Punitive Damages from Name Defendant)... (Claim against Defendant in (his) INDIVIDUAL CAPACITY and HIS OFFICIAL CAPACITY et. al.,) ... (Claim against Defendant for Negligent or Wrongful act or omission acting within the scope of his office or employment)... (Claim against Defendant who acted contrary to established policy in which Plaintiff has a liberty, by establishment in the policy)... (Claim against Defendant for Violation of Plaintiff Civil Rights)... (Claim against Defendant for deliberate indifference regarding to Medical needs)... (Claim against Defendant who knew or should have known)... (Claim against Defendant regarding and incorrect dosage of Medication (or) Medicine causing and

STATEMENT OF CLAIM

adverse reaction from and combination of two high blood pressure Medication's) ... (Claim against Defendant regarding Plaintiff due process)... (Claim against Defendant who prescribed the Medication LISINAPRIL and which causing Plaintiff to seek Medical Attention)...

Plaintiff Samuel Heywood Myles, come now before and within The United States District Court For The Western District of Wisconsin, with and Medical-Malpractice (suit) or Claim under and Pursuant to Bivens 42 U.S.C. Section 1983... (Claim)... against Medical Staff Doctor, Doctor Ravi Gupta, ... (Claim)... for Violation of Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution.

Come now Plaintiff Samuel Heywood Myles, in and Pro-Se Complaint under and Pursuant to ... Bivens... against Medical Staff Doctor Ravi Gupta, In His Individual Capacity and His Official Capacity.

A.(6).

STATEMENT OF CLAIM

Come now Plaintiff Samuel Heywood Myles, in and Pro-
se Complaint under and Pursuant to... Bivens... 42 U.S.C.
Section § 1983... for Violation of Plaintiff Constitutional Rig-
ht's under the Eighth and Fourteenth Amendment of the
United States Constitution.

Come now Plaintiff Samuel Heywood Myles, filing and Pro-
se Complaint regarding and Medical Malpractice Claim for
Damages under and Pursuant to... Bivens... 42 U.S.C. Se-
ction § 1983... before and within the United States Distri-
ct Court For The Western District of Wisconsin.

Plaintiff Complaint (or) Claim is regarding to and Medi-
cal Drug Overdose from and... (incorrect dosage)... of and
high blood pressure Medication (or) Medicine by Federal
Correctional Institutional Medical Staff at Federal Correction-
al Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, Claim is against two Insti-
tutional Medical Staff, Medical Staff Doctor, Doctor Revi Gupta,
in his Individual Capacity and his Official Capacity et.al.,

A.(7).

STATEMENT OF CLAIM

and Unknown Name Medical Staff Pharmacist in her Individual Capacity and her Official Capacity et. al.,

... and inmate may have and liberty interest arising from a statute, rule, or regulation written in mandatory language...

... due process clause may also be implicated when a prisoner's suffer's personal injury (or) loss of property...

Plaintiff Samuel Heywood Myles, come now before and within The United States District Court For The Western District of Wisconsin, with and claim against Medical Staff Doctor, Doctor Ravi Gupta, and Medical Staff Unknown Name Pharmacist, claim for their Negligent (or) Wrongful act or omission acting within the scope of his (or) her, Office of employment Medical Staff have and has... (Violated)... or are in... (Violation)... of... (1). DUTY: 'an act or course of action that is demanded of one... (2). BREACH: 'to fail to fulfill (c promise)... (3). CAUSATION: 'the act or process of causing... (4). DAMAGES: 'loss (or) resulting from injury, to person, harm...

A.(8).

STATEMENT OF CLAIM

Plaintiff Claim that Medical Staff (or) Official's must provide (Plaintiff), Inmate's with fair treatment, Medical Staff (or) Prison Official's must comply with their own mandatory regulation.

... Plaintiff Claim regarding and Medical Malpractice Claim for contribution, Compensatory Damages and Punitive Damages regarding and Medical Drug Overdose from (and) incorrect dose of... (HIGH BLOOD PRESSURE MEDICATIONS (or) MEDICINES)...

... (1)... (enLODIPine)... (2)... (LISINOPRIL)...

Plaintiff Samuel Heywood Myles, Claim (or) Complaint against Institutional Medical Staff Unknown Name Pharmacist who personally...

... (prepare, preserving, compounding, and dispensing drugs)...
... at the Institution Pill line.

A. (9).

STATEMENT OF CLAIM

Plaintiff Samuel Haywood Myles, Claim (er) Complaint is against Institutional Medical Staff Pharmacist. . (Unknown Name) . . Pharmacist who personally . . (PREPARE and DISPENSATION) . . (Claim) . . forgiving . . (Plaintiff) . . the incorrect dose (er) the . . (HYPERTENSION - MEDICATION - LISINAPRIL) . . and which cause and Medical Overdose from and . . (adverse reaction) . .

Plaintiff Samuel Haywood Myles, Claim that (he) Plaintiff . . (was fully) . . knew that (he) Plaintiff was experiencing and near death experience from and adverse reaction cause by and from and . . (incorrect dose) . . do to and combination of two high blood pressure Medication's and which would cause and Medical Overdose.

. . . (Claim against Defendant for injuries sustained as a result of an Medical-Overdose) . . . (Claim against Defendant who is liable for the amount of unreasonably dangerous cause by and Medical-Overdose) . . . (Claim against Defendant for be-

STATEMENT OF CLAIM

ing in Violation of Duty, Breach, Causation and Damages in regard to end Medical-Overdose)... (Claim against Defendant for Violation of Plaintiff Constitutional Rights under the Eighth Amendment of the United States Constitution)... (Claim against Defendant for Violation of Plaintiff Constitutional Rights under the Fourteenth Amendment of the United States Constitution)... (Claim against Defendant for failure protect Plaintiff from harm, and to provide Plaintiff with reasonable Medical Care)... (Claim for Compensatory Damages and Punitive Damages from Name Defendant)... (Claim against Defendant in (her) INDIVIDUAL CAPACITY and HER OFFICIAL CAPACITY et. al.,)... (Claim against Defendant for Negligent or Wrongful act or omission acting within the scope of her office or employment)... (Claim against Defendant who acted contrary to established policy in whi-

A. (11).

STATEMENT OF CLAIM

ch Plaintiff has a liberty, by establishment in the policy)... (Claim against Defendant for Violation of Plaintiff Civil Rights) ... (Claim against Defendant for deliberate indifference regarding to Medical needs)... (Claim against Defendant who knew or should have known)... (Claim against Defendant regarding and incorrect dose of Medication (or) Medicine causing and adverse reaction from and combination of two high blood pressure Medications)... (Claim against Defendant regarding Plaintiff due process)... (Claim against Defendant who give Plaintiff the incorrect dose (or) the ... (HYPERTENSION-MEDICATION-LISIN-APRIL))... and which cause and Medical overdose from and... (adverse reaction)... claim do to and for... (prepare (or) preparing, preserving, compounding, and dispensing the drugs) at the Institution Pill line.

STATEMENT OF CLAIM

Plaintiff Samuel Haywood Myles, come now before and within The United States District Court For The Western District of Wisconsin with and Medical-Malpractice (suit) or Claim under and Pursuant to Bivens 42 U.S.C. Section §1983... (Claim)... against Medical Staff Unknown Name Pharmacist... (Claim)... for Violation of Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution.

Come now Plaintiff Samuel Haywood Myles, in and Pre-3e Complaint under and Pursuant to... Bivens... against Medical Staff Unknown Name Pharmacist, In Her Individual Capacity and Her Official Capacity.

Come now Plaintiff Samuel Haywood Myles, in and Pre-3e Complaint under and Pursuant to... Bivens... 42 U.S.C. Section §1983... for Violation of Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution.

STATEMENT OF CLAIM

Come now, Plaintiff Samuel Heywood Myles, filing and propose Complaint regarding and Medical Malpractice Claim for Damages under and Pursuant to... Bivens... 42 U.S.C. Section § 1983, ... before and within the United States District Court For The Western District of Wisconsin.

Plaintiff Complaint (or) Claim is regarding to and Medical Drug Overdose from and ... (incorrect dosage) ... of and high blood pressure Medication (or) Medicine by Federal Correctional Institutional Medical Staff at Federal Correctional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, Claim is against two Institutional Medical Staff, Medical Staff Doctor, Doctor Revigunta, in his Individual Capacity and his Official Capacity et. al., and Unknown Name Medical Staff Pharmacist in her Individual Capacity and her Official Capacity et. al.,

... and Inmate may have and liberty interest arising from a statute, rule, or regulation written in mandatory language.

... due process clause may also be implicated when a prisoner's suffer's personal injury (or) loss of property...

A. (14).

CLAIM

Come new Plaintiff Samuel Heywood Myles, in and Pursuant to... (Bivens)... 42 U.S.C. Section § 1983... Claim that Medical Staff Doctor, Doctor Revi Gypter, and Medical Staff Unknown Name Pharmacist both have and has Violated Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution.

Come new Plaintiff Samuel Heywood Myles, Filing and Pro-se Complaint regarding and Medical Malpractice Claim Plaintiff is seeking Damages under and Pursuant to... (Bivens)... Claim before and within the United States District Court For The Western District of Wisconsin.

Plaintiff Complaint (or) Claim is regarding to and Medical Drug Overdose from and... (incorrect dosage)... of two high blood pressure Medication's (or) Medicine's by Federal Correctional Institutional Medical Staff at Federal Correctional Institution Oxford, that's located in Oxford, Wisconsin.

CLAIM

Come now Plaintiff Samuel Haywood Myles, before and within The United States District Court For The Western District of Wisconsin, with and Claim against both Medical Staff Doctor, Doctor Ravi Gupta, and Medical Staff Unknown Name Pharmacist, Claim for their Negligent (or) Wrongful act or omission acting within the scope of his (or) her Office of employment (both) Medical Staff have and has... (Violated)... are in... (Violation)... of... (1). Duty, ... (2). Breach)... (3). Causation)... (4). Damages)...

Plaintiff Claim regarding and Medical Malpractice Claim for contribution, Compensatory Damages, and Punitive Damages regarding and Medical Drug Overdose from and incorrect dose of high blood pressure Medical (or) Medicine...

Plaintiff Claim that Medical Staff (or) Official's must provide (Plaintiff) (or) Inmate's with their treatment, Medical Staff (or) Prison Official's must comply with their own mandatory regulation...

CLAIM

...(Claim)... After injuries sustained as a result of an Medical Overdose...

...(Claim)... is liable for the amount of unreasonably dangerous cause by and Medical Overdose...

...(Claim)... Violation of Duty, Breach, Causation and Damages...

...(Claim)... Violation of Plaintiff's Constitutional Rights under the Eighth Amendment...

...(Claim)... Violation of Plaintiff's Constitutional Rights under the Fourteenth Amendment...

...(Claim)... Violation of Plaintiff's Due Process...

...(Claim)... Due Process Clause may also be implicated when prisoner's staff's personal injury...

...(Claim)... Failure to monitor Plaintiff's blood pressure...

...(Claim)... duty to protect Plaintiff (or) Inmate's from harm, and to provide reasonable Medical Care...

...(Claim)... Name Defendant's et al., in his (or) her Individual Capacity and his (or) her Official Capacity...

CLAIM

... (Claim) ... Negligent or Wrongful act or omission occurring within the scope of his (or) her office or employment ...

... (Claim) ... acted contrary to established policy in which Plaintiff has a liberty, by establishment in the policy ...

... (Claim) ... deliberate indifference regarding to Medical needs ...

... (Claim) ... Neme Defendant's knew or should have known as to calcium channel blocker used to control high blood pressure or angina ...

Plaintiff Samuel Haywood Myers, come now, before and within The United States District Court For The Western District of Wisconsin, with and Medical Malpractice (suit) or Claim under and Pursuant to ... Bivens ... 42 U.S.C. Section 1983. . . Claim for Violation of Plaintiff Eighth and Fourteenth Amendment Constitutional Rights.

SUPPORTING FACTS

Come now Plaintiff Samuel Heywood Myles, Ailing and Pro-se Complaint regarding and Medical Malpractice Claim for Damages under and Pursuant to... Bivens... 42. U.S.C. Section § 1983... for Violating of Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution, before and within the United States District Court For The Western District of Wisconsin.

Plaintiff Samuel Heywood Myles, Complaint (or) Claim is regarding to and Medical Drug Overdose from and... (incorrect dose)... of two high blood pressure Medication (or) Medicine cause by two Federal Correctional Institutional Medical Staff at Federal Correctional Institution Oxford that's located in Oxford, Wisconsin... (Medical Staff Doctor, Doctor Ravi Gupta, in his Individual Capacity and in his Official Capacity et. al.,) ... and... (Unknown Name Medical Staff Pharmacist in her Individual Capacity and in her Official Capacity et. al.,)...

SUPPORTING FACT'S

... (Fact's is that Inmate(s) may have and liberty interest arising from a statute, rule, or regulation written in mandatory language)...

... (Fact's is that (Both) Name Defendant(s) in this complaint Medical Staff Doctor, Doctor Reviberta, and Unknown Name Pharmacist, (are) and (was) Negligent (or) Wrongful act of omission while acting within the scope of his (or) her, office of employment)...

... (Fact is that each (Both) Name Defendant(s) are in ... (Violation) ... of ... (1). DUTY: 'an act or course of action that is demanded of one) ... (2). BREACH: 'to fail to fulfill (a promise) ... (3). CAUSATION: 'the act or process of causing) ... (4). DAMAGES: 'loss (or) harm resulting from injury to person)...

C.(2).

SUPPORTING FACTS

... (Fact is that Plaintiff Samuel Heywood Myles, who on end routine visit to Medical for... (Hypertension)... Institutional Medical Staff Doctor, Doctor Revibupte, who would personally prescribed and second Medication (or) Medicine for... (Hypertension)... (Medication - Lisinopril)... Institution Medical Staff Doctor, Doctor Revibupte... (who personally didn't request end routine visit (or) any form of regular monitoring of Plaintiff Samuel Heywood Myles, blood pressure before (or) when placing Plaintiff Samuel Heywood Myles, on the Medication (or) Medicine... (LISINOPRIL)... (Because there are Fact Questions))... that Name Defendant knew or should have known that additional monitoring should be performed on and... day to day... best before and while Plaintiff would be prescribed (or) taking the Medication... (Lisinopril)...

SUPPORTING FACT'S

... (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, prescribed the Medication (or) Medicine in question causing and adverse reaction from and... (incorrect dose)... of the Medication Lisinopril and which Plaintiff Samuel Heywood Myles, would end up having and Medical Overdose)... (Fact's that on and about October 8, 2012, Plaintiff Samuel Heywood Myles, would personally have and adverse reaction from and... (incorrect dose)... of the Medication Lisinopril and which was prescribed by Medical Staff Doctor, Doctor Ravi Gupta, causing Plaintiff Samuel Heywood Myles, to have and near death experience)... (Fact is that on and about October 8, 2012, Plaintiff Samuel Heywood Myles, would personally have some several side effects Fact is that Plaintiff would become... dizziness... drowsiness... fatigue... and... weakness... before passing out...).

SUPPORTING FACT'S

... (Fact is that on and about October 8, 2012, Plaintiff Samuel Heywood Myles, after collapsing (or) passing out "Plaintiff" would have to seek immediately medical attention right away Plaintiff would receive the following in the form of medical attention (IV) ... intravenous drip's for Normal saline Infusion solution to Keep Oxygen Flowing to "Plaintiff" Samuel Heywood Myles, Brain) ... (Fact is that while seeking Medical (or) Immediate Medical Attention Plaintiff Samuel Heywood Myles, would personally be hook up to and (EKG) (or) (ECG) Machine to monitor "Plaintiff" heart electrocardiogram galvanometric device that detect's and record's the minute difference in electro potential cause by heart action) ... (Fact is that Plaintiff Samuel Heywood Myles, blood pressure would reduce and drop to ... (89 over 55) ...

SUPPORTING FACTS

... (Fact is that Plaintiff Samuel Haywood Myles, would personally receive and provide ... (Crutches) ... (Fact is that "Plaintiff" would receive the Medication (or) Medicine ... (Ibuprofen Tablet 800mg) ... for pain due to Plaintiff having pain in his (Plaintiff) ... (Left Ankle) ... (Fact is that some ... (10 Day's Later) ... on and about October 18, 2012, Plaintiff Samuel Haywood Myles, ... (was fully unaware at that particular time that from the October 8, 2012, incident ended that ... (his) ... Plaintiff Samuel Haywood Myles, ... (Left Ankle) ... was ... (Broken on Both Sides) ... (Fact is that on and about October 18, 2012, some ... (10 Day's Later) ... after and from the October 8, 2012, incident ended would the Institutional Medical Staff Registered Nurse Mr. Brad Melcom, who personally receive some three set's of X-Ray's on the computer from the Institutional X-Ray

SUPPORTING FACT 'C

LenTech, Fact is that these "PHOTO" would re-
 veal from (his), Institutional Medical Staff
 Registered Nurse Mr. Brad Malcom, finding is
 that from reviewing and examining the... (Ph-
 otographic Films, Fact is only to reveal that Pl-
 aintiff Samuel Heywood Myles, ... (Left Ankle
 Was Broken on Both sides)... (Fact is that on
 and about October 18, 2012, Institutional Medical
 Staff Doctor, Doctor King, who would personally
 fully examine Plaintiff Samuel Heywood Myles,
 ... (Photographic Films)... from the X-Ray's
 taken this occur only after the request of the
 Institutional Medical Staff Registered Nurse
 Mr. Brad Malcom, who would personally reque-
 est that Doctor King, review all three set's
 of ... (Photographic Film's) from the X-Ray's)
 ... (Fact is that Institutional Medical Staff
 Doctor, Doctor King, would reveal that from
 (his) Doctor King, finding is that Plaintiff Sam-
 uel Heywood Myles, have and has a... (Fract-

SUPPORTING FACT'S

ure left foot, left ankle and left leg)... Fact, .
 that done with the... (Photographic)... (Film-
 's)... would fully reveal that Plaintiff Samuel
 Haywood Myles, ... (Left Ankle Was Broken On
 Both Sides)... (Fact is that Institutional Medi-
 cal Staff Doctor, Doctor King, would personally
 take notice at that particular time Fact is that
 Plaintiff Samuel Haywood Myles, ... (Left foot sti-
 ll continued to have swelling and discoloration
 in... (his)... Plaintiff left foot, toe's and left ankle
 at that particular time some... (10 Days L-
 ater)... after the October 8, 2012, incident-
 end... (Fact is that Institutional Medical
 Staff Doctor, Doctor King, would personally
 give Medical Staff Registered Nurse Mr.
 Brad McCom, ... (instructions) only to re-
 commen that Plaintiff Samuel Haywood Myles,
 be treated with and short-leg posterior
 splint ace wrap and instruction for RICE th-
 erapy and limited weight bearing...

SUPPORTING FACTS

... (Fact is that Plaintiff Samuel Haywood Myles, would be examine by Institutional Medical staff Doctor, Doctor King, on and about October 18, 2012, regarding and... (Fracture left foot, left ankle and left toes)... from Doctor King, finding of the... (Photographic Films)... only to reveal that Plaintiff Samuel Haywood Myles, ... (Left Ankle)... was broken on both sides...

... (Fact is that in the form of an offer of proof, and a copy, or the original, of any documentary evidence to be introduced would clearly show a false statement of material within the body of several documents)...

①. in part... Mile Bluff Clinic, LLP Mile Bluff Medical Center

SUBJECTIVE: Is sent by Dr. Gupta for evaluation and treatment of a left ankle fracture...

SUPPORTING FACTS

... (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, "never" once did any form of... (evaluation)... on the (Patient)... (Plaintiff Samuel Heywood Myles,)... on and about October 18, 2012, in the form of an offer of proof, and a copy, or the original, of any document of evidence to be introduced would clearly show that Medical Staff Doctor, Doctor Ravi Gupta, "never" once... (examine)... Plaintiff Samuel Heywood Myles,... (left foot)... (left ankle)... or... (left leg)... at any given time... (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, personally did not instruct (or) recommend that Plaintiff be treated with and short-leg posterior splint)... (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, (1). never come into the examining room... (2). never examine Plaintiff... (3). never review the photographic films X-Ray's alone with Medical Staff Re-

SUPPORTING FACTS

sistered Nurse Mr. Brad Melcom...

... (Fact is that in the form of an offer of proof, and a copy, or the original, of any document of evidence to be introduced would clearly show a false statement of material within the body of several documents)...

(II). in part... Bureau of Prisons Health Services Consultation Request
Consultation/Procedure Requested:
Orthopedic Surgery

... (Fact is that in the form of an offer of proof, and a copy, or the original, of any document of evidence to be introduced would clearly show a false statement of material within the body of several documents)...

SUPPORTING FACT'S

(III). in part... Bureau of Prisons Health Services Clinical Encounter - Administrative Note

Admin Note encounter performed at Health Services.

ADMINISTRATIVE NOTE I. Provider: Melcom, Brad RN

... X-rays were taken and Dr. Gupta viewed films and results. Verbal order to place inmate in Ortholess posterior splint, retain crutches, no weight bearing, Motrin 800mg TID x 7 days. Schedule consult with ortho for evaluation/treatment.

Fact is that in the form of an offer of proof, and a copy, or the original, of any document (or) documentary of evidence to be introduced would clearly show a false statement... (SUBJECTIVE: Is sent by Dr. Gupta, for evaluation and treatment of a left ankle fracture,)... (X-rays were taken and Dr. Gupta, viewed films and results)...

SUPPORTING FACTS

specifically identify that finding and the evidence that supports "Plaintiff" and original copy to be introduced would clearly state that Medical Staff Doctor, Doctor Revi Gupta, never once did any form of evaluation and treatment regarding to Plaintiff Samuel Heywood Myles, left ankle fracture (or) did he Doctor Revi Gupta, request that Plaintiff be placed in and Orthogloss posterior splint, in the form of an offer of proof, and a copy, or the original document (or) documentary to be introduced would "clearly" state that Medical Staff Doctor, Doctor King, would personally examine Plaintiff Samuel Heywood Myles, ... (Fracture left foot, left ankle and left leg and from Doctor King, finding of the ... (Photographic Films or X-Ray's) ... would reveal that Plaintiff Samuel Heywood Myles, ... (LEFT ANKLE) ... was broken on both sides "Fact" is that Doctor King, would be the one who would recommend that Plaintiff Samuel Heywood Myles, to be treated with and short-leg posterior splint.

SUPPORTING FACTS

Fact is that Institutional Medical Staff Pharmacist
... (Unknown Name Pharmacist) ... who personally ...

- (1). Prepare
- (2). Preserving
- (3). Compounding
- (4). Dispensing

... the incorrect dose of the (Hypertension Medication
(or) Medicine Lisinopril) and which would cause and
Medical-Overdose from and adverse reaction ...

Fact is that Unknown Name Pharmacist was Negligent or Wrongful act or omission acting within the scope of (her) office or employment for injuries sustained as a result of an overdose of the Medication (or) Medicine ... Lisinopril ...

Fact is that Unknown Name Pharmacist ... (Violated) ... (1). Duty ... (2). Breach ... (3). Causation and (4). Damages regarding Plaintiff Samuel Heywood Myler, due process may also be implicate when a prisoner suffer's personal injury.

SUPPORTING FACTS

Fact is that Medical Staff Unknown Name Pharmacist who personally... (prepare... preserving... compounding... and dispensing)... the Medication (or) Medicine Lisinopril knew or should have known that failure to monitor Plaintiff Samuel Heywood Myles, blood pressure would cause (him) Plaintiff Samuel Heywood Myles, harm...

Fact is that Medical Staff Unknown Name Pharmacist failure to have Plaintiff Samuel Heywood Myles, blood pressure check or to check for any possible side effects that may occur while taking and second (or) two calcium channel blocker used to control high blood pressure or angina.

Fact is that form of an offer of proof, and a copy, or the original, and document (or) documentary of evidence to be introduced would clearly show that Medical Staff Unknown Name Pharmacist that on and about October 8, personally would... (prepare)... (preserving)... (compounding)... (and dispensing)... all Medication's (or) Medicine's for the Institution morning... (Pill-Line)...

FACT'S

Come now Plaintiff Samuel Heywood Myles, in and Pro-Se Complaint under and Pursuant to... BIVENS... 42 U.S.C. SECTION § 1983... before and within The United States District Court For The Western District Of Wisconsin.

Plaintiff Samuel Heywood Myles, filing and Pro-Se Complaint regarding and Medical Malpractice Claim for Damages under and Pursuant to... BIVENS... 42 U.S.C. SECTION § 1983... for and regarding to and Medical Drug Overdose from and... (incorrect-dosage)... of several... (high blood-pressure "Medications")... by Federal Correctional Institutional Medical Staff at Federal Correctional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, filing and Pro-Se Complaint regarding and Medical Malpractice suit before and in The United States District Court For The Western District Of Wisconsin against the name(s) Defendant's in his/or/ her Individual Capacity and Official Capacity et. al.

FACT'S

Institutional Oxford Medical Staff Doctor, Doctor Ravi Gupta, and the Institutional Oxford... (Unknown)... Name Medical Staff Pharmacist, for injuries sustained as a result of an incorrect dose of and (combination) of both high blood pressure Medications...

(1)... (en LODIPine)...

(2)... (LISINOPR)...

Plaintiff Samuel Haywood Myles, who on end routine visit to Medical Per... (Hypertension)... Institutional Medical Staff Doctor, Doctor Ravi Gupta, would personally prescribed end second Medication Per... (Hypertension)... Institutional Medical Staff Doctor, Doctor Ravi Gupta, didn't request end routine visit (or) regular monitoring of Plaintiff blood pressure before (or) when placing Plaintiff on the Medication... (LISINOPRIL)...

On end about October 8, 2012, Plaintiff Samuel Haywood Myles, would personally have end adverse reaction from end combination of both blood pressure Medications... (1). en LODIPine... (2). LISINOPRIL.

D. (2).

FACT'S

On and about October 8, 2012, after some several day's of being schedule or require to go to Medical for the institutional morning Pill-Line at (or) around 7:30 AM so Plaintiff Samuel Haywood Myles, could take (his) assign Medication's at that particular time...

- (1)....(ASPIRIN)...
- (2)....(amlODIPine)...
- (3)....(LISINOPRIL)...
- (4)....(TRIAMTERENE)...

On and about October 8, 2012, after the 10:00 AM morning count around 10:20 AM Plaintiff Samuel Haywood Myles, would become light headed and at that particular time Plaintiff would personally inform Wood Unit Officer Mr. Grensee, before passing out and collapsing into and second Inmate car's by the (Name) of... (Eric Holiday)...

FACT'S

At that particular time Plaintiff Samuel Haywood Myles, ... (was - fully) ... unaware that he was experiencing and near death experience from and adverse reaction cause by and ... (incorrect dosage) ... do to and combination of two high blood pressure Medications in which would cause and Medical Overdose.

In Part:

...PATIENT MEDICATION INFORMATION...

...cm LODIPINE / and / LISINOPRIL ...

CAUTIONS:

This Medication May Cause Drowsiness Or Dizziness

This medicine may cause dizziness, lightheadedness, or fainting

FACT'S

POSSIBLE SIDE EFFECTS:

SIDE EFFECTS that may occur while taking this medicine include: dizziness, drowsiness, fatigue, or weakness.

SEEK MEDICAL ATTENTION RIGHT AWAY if any of these SEVERE side effects occur: fainting, severe or persistent dizziness,

but seek immediate medical attention if it occurs.

Overdose:

If overdose is suspected contact your local poison control center or emergency room immediately. Symptoms of overdose may include dizziness, fainting, and a fast heart beat.

FACT'S

NOT include all information about the possible uses, directions, warnings, precautions, interactions, adverse effects, or risks that may apply to this (or) these... (Medicine)...

Document In Pert.:

Bureau of Prisons Health Services Clinical Encounter: Page... (5 of 6)...

Assessment:

Other

Neer syncope episode.

Unit Officer Mr. Bronsee, called for a medical emergency in Wood Unit common area for inmate feeling dizzy. I was instructed to bring a wheelchair. Found I/M Myles, A&O x 3 (Person, Place, Time) he was a bit confused to the situation that just happened.

D.(L).

FACT'S

He remember being dizzy and having someone catch him prior to hitting the floor. Bystanders informed me Myles, did not hit his head on the floor when he fell. Another inmate caught him and assisted him as he twisted to the floor.

Myles, was alert, his airway was patent and open. He was breathing slightly fast but not in respiratory distress. He was able to speak in full sentence without dyspnea. His skin color was pale and slightly clammy to touch. His initial radial pulse was slow but strong. We moved Myles, to the wheelchair and transported him to the medical dept. urgent care.

Institutional Medical Staff Registered Nurse Mr. Brad Malcom, would rush over to Wood Housing Unit only after being informed to end Medical emergency and was requested to arrive with end wheelchair only to rush Plaintiff Samuel Haywood Myles, over to Medical to seek immediate Medical Attention first upon arrival at Medical Plaintiff would receive.

D.(7).

FACT'S

... (IV) intravenous drip per Normalsaline Infusion solution to keep... (OXYGEN FLOWING to Plaintiff Brain)...

While seeking Medical (er) Immediate Medical Attention Plaintiff Samuel Heywood Myles, would personally be hooked up to and...

... (EKG - (er) - ECG) Machine to monitor Plaintiff heart electrocardiogram a galvanometric device that detects and records the minute difference in electropotential cause by heart action...

Plaintiff Samuel Heywood Myles, from this near death experience and adverse reaction from and Medical Drug Overdose from and combination of both high blood pressure Medication's.

... (am LODIPINE)... (LISINAPRIL)...

- COMMON USES: These medicine is a calcium channel blocker used to control high blood pressure...

D. (8).

FACT'S

...Reducing High Blood Pressure...

Plaintiff Samuel Haywood Myles, Blood pressure would drop and lower to... (89 over 55)... from this near death experience.

Third Plaintiff Samuel Haywood Myles, would receive a pair of... (Crutches)... and fourth in the form of Medication (or) Medicine some Ibuprofen Tablet 800mg before returning back to the Housing Unit.

Some... (10-Day's Later)... on and about October 18, 2012, Plaintiff Samuel Haywood Myles, ... (was fully unaware at that particular time that from the October 8, 2012, incident and that his Plaintiff Left Ankle was Broken on both sides)...

On and about October 18, 2012, some... (10-Day's Later)... after and from the October 8, 2012, incident then would the Institutional Medical Staff Registered Nurse Mr. Brad Malcom, would personally receive three set's of X-Ray's on the computer from the Institutional X-Ray Lap Tech

FACT'S

these "photo" would reveal from this Institutional Medical Staff Registered Nurse Mr. Brad Melcom, finding is that from reviewing and examining the... (photographic films)... only to reveal that Plaintiff Samuel Heywood Myles, left ankle was broken on both sides.

On and about October 18, 2012, Institutional Medical Staff Doctor, Doctor King, who would personally fully examine Plaintiff Samuel Heywood Myles, photographic films from the X-Ray's taken this occur only after the request of the Institutional Medical Staff Registered Nurse Mr. Brad Melcom, who would personally request that Doctor King, review all three set's of photographic film's from the X-Ray's.

Institutional Medical Staff Doctor, Doctor King, would reveal that from this Doctor King, finding of both fully examining Plaintiff Samuel Heywood Myles,...

... (fracture left foot, left ankle and left leg...
... alone with the photographic films would fully reveal that Plaintiff Samuel Heywood Myles, left ankle was broken on both sides.

FACT'S

Institutional Medical Staff Doctor, Doctor King, would personally take notice at that particular time is that Plaintiff Samuel Heywood Myles, left foot still continued to have swelling and discoloration in his Plaintiff left foot, toe's and ankle at that particular time some... (10-Day's)... after the October 8, 2012, incident end.

Institutional Medical Staff Doctor, Doctor King, would personally give Medical Staff Registered Nurse Mr. Fred Malcolm, instructions (only) to recommend that Plaintiff Samuel Heywood Myles, be treated with and short-leg plaster splint ace wrap and instruction for RICE therapy and limited weight bearing.

On and about November 27, 2012, Plaintiff Samuel Heywood Myles, would be transported by Federal Correctional Institutional Staff from Oxford to Mile Bluff Clinic, LLP Mile Bluff Medical Center at the request of the Institutional Medical Department Head Mr. C. Lopez.

FACTS

Document In Pert.:

Mile Bluff Medical Center Fax
Mile Bluff Clinic, LLP
Mile Bluff Medical Center

History of Present Illness:

This 56 year old male presents with:
L + ankle injury

SUBJECTIVE: THIS 56-year-old gentleman who is an inmate at the Oxford Correctional Institution,

treatment of a left ankle fracture.

This actually occurred on 10/08/12.

blacked out and fell, sustaining an isolated injury to the left ankle. He was diagnosed with a lateral malleolus fracture and was treated with a short-leg posterior splint, limited weight bearing with crutches, elevation and ice,

D. (12).

FACT'S

and eventually some heat application.

He denies any history of previous ankle injury, and this is of note because of the x-ray findings, which will be described later.

OBJECTIVE: The posterior splint is removed. There is no clinical bone deformity, although he does have a little bit of swelling medially.

The patient notes some tenderness to palpation throughout the majority of the length of the fibula, but interestingly

He has a little bit of tenderness at the medial ankle ligament complex,

X-rays: I reviewed three sets of x-rays from Oxford.

This consists of an ankle series and a foot series from October 14th, and an ankle series from November 19th.

FACT'S

He has at least a couple of small cortical evulsions at the tip of the medial malleolus, but the medial malleolus itself has a little bit of misshapen characterization,

ASSESSMENT. Patient with a left ankle later-al malleolus fracture, with a medial ankle sprain. He is healed enough to come out of the splint and start weightbearing as tolerated. He should discontinue the crutches when he can comfortably bear full weight, whether that is today, a couple days, or several days down the road. He should be kept from running and jumping activities, sports, and weight-lifting that requires use of the lower extremities for an additional 3 weeks. Follow up will be on a p.r.n. basis. Now that the splint is removed, any ankle and foot swelling may become more prominently seen and he can have the swelling come and go, depending on his levels of activity, as well as amount of time of

FACT'S

elevation, and can be expected over the next few weeks to few months.

cc: Ravi Gupta, MD / Oxford Correctional Institution

Provider: Robert R. Riedle MD 11/27/2012

Electronically signed by Robert R. Riedle MD
on 11/27/2012 09:23 AM

Fact is that Plaintiff Samuel Haywood Myles, is... (handicap) From the October 8, 2012, incident Plaintiff is unable to wear the institutional issue boot's (or) any hard shoe when walking in hard boot's (or) shoe's Plaintiff foot seems to twizzle and turn end ward.

As of date Plaintiff is still having some pain (or) soreness across his left foot from ankle to ankle on both side's.

FACT'S

Plaintiff Samuel Heywood Myles, with pain running up and down behind his ankle and up pass his ankle some several inches also at this particular time Plaintiff walking have and has become alter in regard and (do) to his left foot and ankle also as date Plaintiff Samuel Heywood Myles, is walking with and slight limp.

Fact's is that both Doctor Revi Burp-
te, and Unknown Name Pharmacist, have
and has violated Plaintiff Constitutional
Right's under the Eighth and Fourteen-
th Amendment... Medical staff has a
duty to protect Plaintiff from harm, and
to provide him reasonable medical care co-
sistent with policies and procedures...
Defendants knew or should have known...
...for their negligent or wrongful act or o-
mission acting within the scope of their
office or employment...

RELIEF

WHEREFORE, the premises consider, the Plaintiff demand's judgement against the (Name) Defendant's both in his (or) her Individual and Official Capacity regarding and... (incorrect dosage of high blood pressure medication's causing and Medical-Overdose).

Plaintiff Samuel Heywood Myles, come now before and within The United States District Court For The Western District Of Wisconsin, with and Medical-Malpractice (suit) or Claim against Medical Staff Doctor, Doctor Ravi Gupta, and Unknown Name Medical Staff Pharmacist, Plaintiff seeking contribution for both Compensatory Damages and Punitive Damages for their Negligent or Wrongful act or omission acting within the scope of his (or) her office or employment.

(1). Plaintiff Samuel Heywood Myles, is seeking... (Relief) ... contribution in Compensatory Damages and Punitive Damages against Medical Staff Doctor, Doctor Ravi Gupta, who... (PRESCRIBED)... the... (Second)... medication (or) medicine that's in question.

RELIEF

Medical Staff Doctor, Doctor Ravi Gupta, was Negligent or Wrongful within the act or omission while acting within the scope of his office or employment.

Medical Staff Doctor, Doctor Ravi Gupta, never requested for any additional monitoring before placing Plaintiff on the... (second)... medication (or) medicine and which Plaintiff Samuel Heywood Myles, would sustained injuries as a result of an overdose.

(2). Plaintiff Samuel Heywood Myles, is seeking... (Relief)... contribution in Compensatory Damages and Punitive Damages against Medical Staff Unknown Name Pharmacist who... (preparing, preserving, compounding, and dispensing drugs)...

Medical Staff Unknown Name Pharmacist, was Negligent or Wrongful within the act or omission while acting within the scope of her office or employment.

RELIEF

Medical Staff Unknown Name Pharmacist, ...
never question Plaintiff Samuel Heywood Myles, et al.
ore...

... (preparing, preserving, compounding,
and dispensing drugs)...

... regarding the second Medication (or) Medicine ing-
estion... (LISINPRIL)... or both prescribed high
blood pressure Medication's concerning the amount
of damage,.

Plaintiff Samuel Heywood Myles, in and Pre-3c Complaint
seek Relief under and Pursuant to... Bivens... 42 U.S.C.
Section 1983... for Violation of Plaintiff Constitutional Right-
's under the Eighth and Fourteenth Amendment of the
United States Constitution, Institutional Oxford Medical Staff
Dr. Doctor, Doctor Reviberta, and the Institutional Oxford Unknown
Name Medical Staff Pharmacist Loth in his (or) her's Individ-
ual Capacity and Official Capacity et al, for injuries sustain-
ed as a result of an incorrect dose of Medication causing
and Medical-Overdose.

JURY TRIAL DEMAND.

DEMAND FOR JURY TRIAL, Compensatory and exemplary damages set forth in the instant of this complaint therefore Plaintiff hereby exercises his Second Amendment Constitutional Right to have all genuine issues of material fact's address in controversy, determined, solely by a jury selected properly from within the judicial district as prescribed by law.

I am requesting that a subpoena D.T. to the Warden at Federal Correctional Institution Oxford that's located in Oxford, Wisconsin as custodian of the records the following records are Material to my case at Bar and I am unable to proceed without them.

(1). any and all document(s), Rec, Written (or) other WISP And to please issue a mittimus order for the U.S. Marshal's Office to serve the... (SUBPOENA-WITH OUT COST)...

CERTIFICATE OF SERVICE

I, Samuel Haywood Myles, hereby certify that I have served a true and correct copy of the following:

Filed and Complaint for Violation of
Civil Rights under the Civil Rights Act
42 U.S.C. Section 1983

United States District Court For The
Western District of Wisconsin

Which is deemed filed at the time it was delivered to
prison authorities for forwarding to the Court,
Houston vs. Lack, 101 L. Ed. 2d 245 (1988)
upon the court and parties to litigation and or his/her at-
torney(s) of record, by placing same in a sealed, postage
unpaid envelope addressed to:

By way of the U.S. Mail to...
United States District Court For The
Wisconsin District of Wisconsin

U.S. Courthouse
120 North Henry Street Room 320
Madison, Wisconsin 53703

and deposited same in the United States Postal Mail at the
Federal Correctional Institution Milan located in Milan, Michigan.
this 24 Day of September 2014... Samuel Haywood Myles